

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Petition for Rulemaking: Amendment of	)	CG RM-11844
Rules Governing Ultra-Wideband Devices	)	
and Systems	)	

**1. Introduction**

DDSports, Inc (“DDSports”) is pleased to provide these comments in support of the Petition for Rulemaking regarding Ultra-Wideband (“UWB”) devices submitted by Robert Bosch LLC (“Bosch”), and further supporting the comments of the UWB Alliance.

DDSports produces FCC Certified Part 15 Subpart F UWB systems for high speed RTLS tracking of players and game objects in college and professional sports. The data generated by our UWB systems provides coaches, players, fans, and broadcast agencies with real-time data that enhances the overall sporting experience. For coaches and players the data is invaluable for understanding player efficiencies as well as monitoring player load and overall athletic performance. For broadcast agencies the data is utilized in real-time on-screen graphics and deep analytics that results in a much more engaging fan experience.

**2. Support**

DDSports supports the Bosch petition in general and encourages the FCC to consider the comments from the UWB Alliance, in particular the “Incremental Opportunity”. We feel compliance based on the petition and comments will result in a healthy increase in UWB adoption and provide all technologies the ability to coexist at frequency and power levels non-disruptive to all stakeholders.

UWB at frequencies between 4 and 7 GHz plays a vital role in our ability to supply sporting data to consumers. With installations in large facilities, typically with large WiFi systems, the importance of output power and frequency interference mitigation is highly important to the deployment and success of UWB systems in any venue.

As discussed in several supporting filings the FCC stated their intention to revisit the rules governing UWB soon after issuance. By introducing the review 17 years after existence the FCC has an opportunity to take into consideration a wealth of industry experience from all UWB stakeholders regarding power levels and methods for co-existence. We respectfully request the FCC begin the review of existing rules and take into consideration that industry experience gained by the members of the UWB community.

Respectfully submitted,  
DDSports, Inc

By:

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CTO